COLLETTE MINE STREAM RESTORATION PROJECT
FINAL ENVIRONMENTAL ASSESSMENT
DECISION NOTICE AND FINDING OF NO SIGNIFICANT IMPACT
USDA Forest Service, Lochsa Ranger District,
Nez Perce- Clearwater National Forest, Idaho County, Idaho

Decision Summary

This Decision Notice documents my decision to select Alternative 2 as described in the Collette Mine Stream Restoration Project Environmental Assessment (EA) issued on December 12, 2014. The selected alternative will restore floodplain connectivity, increase the quantity and quality of fish habitat available, and restore native vegetation through riparian planting.

Project Background

The project is located about 11 miles southeast of Weippe, Idaho. The project area encompasses about 30 acres of riparian/floodplain and 0.6 miles of Lolo Creek. Lolo Creek flows through the former Collette Mine site and has been impacted by past dredge mining activity. The Collette Mine Stream Restoration Project area is located in T35N, R06E, Section 32. The design of this project has been completed in partnership with the Nez Perce Tribe Watershed Division.

The purpose of the project is to re-establish natural hydrologic processes including floodplain access and stream channel migration patterns; improve fish habitat and reduce chronic sediment delivery to Lolo Creek; improve soil conditions; and restore native plant communities at the former Collette Mine site. During the late 1970s and early 1980s, the stream and floodplain area within the proposed project area was mined by backhoes and dozers leaving behind legacy tailings piles and dredge ponds on the floodplain. This has resulted in the constriction of the stream by mine tailing piles and only minimal access to its floodplain, off channel habitats and wetland areas. The stream bank lacks stability which annually contributes to sediment input into Lolo Creek especially during high spring flows. Riparian vegetation is sparse with a high component of non-native spotted knapweed and grasses and lacks much of the native shrub component.

Decision

After careful consideration of the analyses, applicable laws, and public comments, I have decided to implement Alternative 2. This decision is based on information contained in the project record including the EA and the effects analysis described in Chapter 3, the management requirements of the applicable laws and policies, the mitigation measures and design features described below and the comments received during the public involvement process for this project. Alternative 2 will implement the following management activities, design and mitigation features and monitoring activities.

I have chosen to implement Alternative 2 because it best meets the purpose and need for improving access to potential habitat for fish, including steelhead, and westslope cutthroat trout, chinook salmon, and other aquatic organisms. There is a need to reduce the chronic addition of sediment to Lolo Creek from the mine site and to improve the quality and quantity of aquatic

habitats in this portion of the creek.

Management Activities

Project activities consist of the following:

- Restore floodplain connectivity, bankfull and low flow width to depth ratios to 0.6 miles of Lolo Creek by re-contouring tailing piles on 7 acres of historic floodplain. About 2,800 linear feet of disturbed streambanks would be recontoured to natural gradients and vegetated to provide for long-term streambank stability.
- Reconnect 1,200 feet of Lolo Creek into its original channel in the lower section of the project area. This would increase the sinuosity of Lolo Creek and the amount of available in-stream habitat for fish and other aquatic organisms.
- Increase in-stream large woody material (greater than 12 inches in diameter) by installing18 large and small wood structures in association with the creation of pool habitats. This would increase the quantity and complexity of juvenile rearing habitat in the stream.
- Plant and protect riparian zones to enhance stream bank stability and reduce excessive bank erosion rates; to provide for long term recruitment of wood; and to restore native plant diversity.
- Install up to 4,000 feet of additional fence along new channel segments to remove ungulate browse pressure for maximum plant growth for up to ten years.

Monitoring and mitigation requirements are described below. BMP's, mitigation measures, and monitoring requirements will be implemented as part of my Decision.

Design Features and Mitigation Measures

Project design measures are aimed at avoiding specific resource issues. A majority of these are derived from site specific best management practices (BMP) from the Idaho Forest Practices Act and Stream Channel Alteration Handbook.

Best Management Practices (BMPs) would be applied to maintain slope stability, minimize soil disturbance, erosion and sediment delivery. Design features for various project phases are described below.

The following design features would be used during project impementation:

- Noxious weed control would occur in 2015. Pre-treatment of noxious weeds with appropriate chemicals and manual pulling have occurred in 2013 and 2014 where disturbance activities are planned.
- Ground disturbing activities would be conducted during the dry season and would follow an approved 'Stormwater and Erosion Control Plan' to be submitted by the contractor.
- The contractor would have fuel spill containment supplies onsite in the event of a fuel spill and their employees would be trained in the proper application and use of those materials.

- The instream work would be conducted between July 15 and September 15 to minimize impacts to steelhead trout and Chinook salmon spawning and rearing.
- Dewatering would occur along streambank and wet floodplain grading areas to minimize potential sediment delivery into Lolo Creek and would follow an approved 'Work area isolation and dewatering plan' to be submitted by the contractor.
- Streambank reconstruction activities would be staged so that only one area would be isolated and worked at a time. This would limit the amount of instream/floodplain disturbance at any given time.
- Large wood used for bank structures would primarily be obtained from activities occurring outside of PACFISH RHCAs on National Forest Lands (e.g., gravel pit expansion and temporary road construction). Trees salvaged during floodplain grading on 0.6 acres of the western margin of the floodplain would be incorporated into streambank structures or floodplain roughness. This salvage area is distant enough from Lolo Creek that the trees are not providing stream shade, bank stability, or potential future wood contribution to the creek.
- Water would be slowly released into the newly realigned stream channel in the lower portion of the project area to minimize sediment movement into Lolo Creek.
- Electrofishing and fish salvage, as well as mussel salvage, would occur prior to the release of water into the newly realigned channel. Electrofishing activities would occur in accordance with ESA guidelines from NOAA and the State of Idaho Department of Fish and Game Scientific permit. Any fish and mussels collected would be relocated upstream of the new channel.
- Reconstructed floodplains would incorporate woody material, other roughness features, and the planting and seeding of native species for erosion control, floodplain stability and habitat diversity. Machine access areas would be decompacted and also planted and/or seeded with native species.
- Plantings would utilize native shrubs and forbs throughout the area to encourage the growth of a variety of riparian species. In addition to container plantings, shrubs and other desirable wetland plants would be salvaged from the floodplain grading area and would be transplanted after floodplain reconstruction activities are completed.
- Temporary fencing would be installed around portions the project area to exclude livestock grazing and would be maintained for 10 years or until vegetation is sufficiently established. An 18" gap between the ground and fence bottom would be used to allow for big game movement.
- A temporary bridge over Lolo Creek would be used to provide access to the upstream project area. This would minimize disturbance to the stream channel and minimize the risk of fuel or other hazardous material from entering Lolo Creek.
- Live-water machine crossing will be designated for excavator access to 2 streambank work locations in the upper project area. Live-water crossings by the excavator will be limited to no more than 10 crossings.

- Equipment used for instream work would be cleaned of external oil, grease, dirt and mud; and leaks repaired; prior to arriving at the project site. All equipment would be inspected by the COR before unloading at site. Equipment would be inspected daily for leaks or accumulations of grease, and identified problems corrected before entering streams or areas that drain directly to streams or wetlands. This cleaning shall also remove all dirt and plant parts to ensure that noxious weeds and aquatic invasive species are not brought to the site.
- Fuel storage and machine fueling would occur a minimum of 100' away from Lolo Creek to minimize the risk of a fuel spill into Lolo Creek.
- If elemental mercury is found during project work, procedures outlined in the Best Management Practices for Mercury Collection from Restoration Activities in Lolo Creek (Appendix B) would be implemented.
- Any required permits for disturbance of water or wetlands would be obtained prior to initiating work (Army Corps of Engineers 404 permit, Idaho Department of Water Resources Stream Alteration Permit). Any additional mitigation measures identified in the permitting process would be incorporated into the project plans.

Monitoring

Turbidity monitoring will be conducted at critical periods during project implementation and reported to NMFS and USFWS after the analysis and a summary of results are complete. Idaho Water Quality Standards specify that turbidity cannot exceed 50 NTU instantaneous measurement, or 25 NTU for a 10-day period, over background turbidity (IDAPA 58.01.02; http://adminrules.idaho.gov/rules/current/58/0102.pdf).

Prior to actions that may cause turbidity, a background turbidity reading will be taken 100 feet upstream of the project area and turbidity monitoring will be initiated downstream of the anticipated turbidity source. During actions where turbidity is expected, a sample must be taken at least every 30 minutes and approximately 600 feet downstream from the point of discharge, or most appropriate downstream site, during sediment pulses and be compared against the background measurement. If turbidity levels exceed 50 NTUs over background levels for three consecutive readings (within 90 minutes), the turbidity producing activity will be paused to allow turbidity to return to near background levels before proceeding and procedures will be modified to reduce turbidity and slow the release of sediment.

Monitoring for isolated fish during stream bank work and relocating fish out of the project area as needed prior to instream channel construction implementation would be conducted.

Rationale For The Decision

My criteria for making a decision on this project was based on how well the management actions analyzed in the EA address the purpose and need of the project and considerations of issues that were raised during the scoping process. I considered Forest Plan and Record of Decision standards and guidance for the project area, and took into account competing interests and values of the public.

I have selected Alternative 2 because it best meets the Purpose and Need for action and is responsive to public comments and other agency concerns (EA, pages 8-11, Appendix A; and project file, comment letters). Site specific analysis determined that Lolo Creek has been constricted by mine tailing piles, primarily on the western edge in the upper reach, and also straightened and constricted in the lower reach. These piles have reduced access to the historic floodplain and have prevented natural stream channel migration across the valley floor, thus disconnecting off channel habitat and wetlands from the stream. This constriction also increases stream velocities and erodes the stream bed and tailings piles during springtime high flows.

Soil and vegetation in the riparian area have been heavily impacted by past mining. Riparian species composition currently consists of grasses and forbs with sporadic willow and mixed conifer species. Introduced weedy species are found throughout project area, especially along compacted areas previously disturbed by machinery.

Specifically, Alternative 2 best meets the purpose and need because it restores floodplain access, reduces a chronic sediment source to Lolo Creek, reestablishes native riparian vegetation and improves the quantity and quality of fish habitat in Lolo Creek.

Issues were generated internally, by the Interdisciplinary Team, and externally, through public comments. Involvement of all interested individuals, business, organizations and county, state and federal agencies and the Nez Perce Tribe was sought to provide detailed information for defining the issues, concerns, mitigations and treatment options.

The interdisciplinary team designed the project to minimize effects on resources. Analysis of public and internal comments identified no significant issues that would drive additional alternatives. However, these comments did identify concerns or non-significant issues that deserved consideration, and were used to refine the scope of the alternatives considered. These concerns were addressed through project design features and resource protection measures. I find that the range of alternatives considered is thorough and complete.

Other issues were raised and discussed in the EA (pages 7-11) but were not evaluated in detail because the alternatives already mitigated the issue or the issue was not applicable to the proposal.

I believe the issues and concerns identified throughout the scoping and planning process were fully addressed during alternative development and analysis.

Public Involvement

On April 12, 2012, a scoping letter describing the proposed action, location and purpose and need were sent to the Nez Perce Tribe and interested individuals, businesses, organizations and agencies. A legal notice and request for public comment appeared in the Lewiston Tribune on that date. Letters or messages received from six commenters were considered in the analysis. The EA was sent out to the six commenters and a legal ad appeared in the Lewiston Tribune on December 12, 2014. No comments were received.

Consideration of Issues

There were no issues identified during scoping that lead to the development of alternatives to the proposed action (EA, pg. 7).

Other issues were raised and discussed in the EA (pgs.8-11) but were not evaluated in detail because the alternatives already mitigated the issue through design feature implementation (effects to sensitive or ESA listed species) or the issue was not applicable to the proposal (project funding).

I believe the issues and concerns identified throughout the scoping and planning process were fully addressed during alternative development and analysis.

Consideration of Public and Other Agency Comments

The formal scoping period for this project ended May 18, 2012. Comments that were received were used to develop the issues and alternatives that were included in the EA and to ensure that those issues and alternatives were adequately analyzed.

The comment period for the EA ended on January 12, 2014. No comments were received during the EA comment period.

Finding of No Significant Impact

I have determined through the Collette Mine Stream Restoration Project Environmental Assessment that this is not a major federal action individually or cumulatively that will significantly affect the quality of the human environment; therefore, an Environmental Impact Statement is not needed. This determination is based on the analysis of the context and intensity of the environmental effects, including the following factors:

(1) *The analysis considered both beneficial and adverse effects.* Beneficial and adverse direct, indirect and cumulative environmental impacts discussed in the Environmental Assessment have been disclosed within the appropriate context and intensity. No significant effects on the human environment have been identified. There will be no significant direct, indirect, or cumulative effects to threatened, endangered, MIS, or sensitive species, or other components of the environment (*EA, pg. 18-25*).

(2) *No significant adverse effects to public health or safety were identified.* None are unusual or unique to this project.

(3) *There will be no significant impacts to unique characteristics of the area* such as wetlands, park lands, wild and scenic rivers, floodplains, prime farm lands, old growth forests, range and forest land, minority groups, civil rights or consumers. No effects are expected to historic properties or cultural resources (*EA, pg. 26*).

(4) *The effects of implementation of this decision are not likely to be highly controversial*

and therefore there has been no scientifically backed information that indicates substantial controversy about the effects disclosed in the Environmental Assessment.

(5) Based on similar actions in the area and the resource professionals that worked on this project, *the probable effects of this decision on the human environment, as described in the EA, are well known and do not involve unique or unknown risks*. Activities approved in this decision notice are routine projects similar to those that have been implemented under the Clearwater National Forest Land and Resource Management Plan over the past 23 years.

(6) *This action does not establish precedence for future actions with significant effects*, nor does it represent a decision in principle about a future consideration. Activities approved in this decision notice are routine projects similar to those that have been implemented under the Clearwater National Forest Land and Resource Management Plan over the past 23 years.

(7) *These actions are not related to other actions that, when combined, will have significant impacts.* This decision is made with consideration of past, present and reasonably foreseeable future actions on National Forest land within potentially affected areas which could have a cumulative significant effect on the quality of the human environment. Each resource section effects analysis contained in the Collette Mine Stream Restoration Project EA discusses cumulative effects; none were found to be significant (*EA, Chapter 3*).

(8) *The action will have no effect on districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places.* The project complies with the terms of the Clearwater National Forest Programmatic Agreement (PA) with the Idaho State Historic Preservation Office (SHPO) The project is in compliance with Section 106 of the National Historic Preservation Act and consistent with state and federal archaeological statutes (Project Record, Cultural Resources Section). There would be no effects to cultural resources from project activities. (*EA, pg. 26*).

(9) *The effects on endangered or threatened species and their habitat are discussed in the Biological Assessment* which has been completed for the project. As required by the Endangered Species Act, specific habitat needs for Threatened and Endangered species of fish and wildlife in regards to the proposed project were analyzed and documented in a Biological Assessment (see project file). The effects analysis concluded that the project would have a *no effect* determination for fall Chinook salmon and Canada lynx. As per the ESA consultation process, the no effect determination concludes the ESA process for the above listed species and their habitat. The project *may affect, but would not likely adversely* affect bull trout. Effects would be short term with long term benefits. The project *may effect, likely to adversely affect* steelhead trout and their designated critical habitat; however effects would be short term with long term benefits. Consultation with the NOAA Fisheries has initiated, with concurrence likely to be reached on these determinations through the new Programmatic BA for ***Habitat Restoration Projects in Idaho***. The Forest would not make any irreversible or irretrievable commitment of resources which would affect the formulation or implementation of any reasonable and prudent alternative measures so as not to violate subsection (a)(2) of the Endangered Species Act.

(10) *This decision is in compliance with relevant federal, state and local laws, regulations and requirements designed for the protection of the environment.* Effects from this action meet or exceed state water quality standards through the implementation of design features and best management practices (*EA, pgs. 27-28*).

Other Findings

This decision is consistent with the goals, objectives, and direction contained in the 1987 Clearwater National Forest Land and Resource Management Plan (Forest Plan), the Endangered Species Act, and the National Historic Preservation Act (*EA, pgs. 26-27).*

This decision is in compliance with Executive Order 12989 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations". No minority or low-income populations would be disproportionately affected under either alternative.

Opportunity to Object

The Collette Mine Stream Restoration Project is subject to the objection process pursuant to 36 CFR 218, Subparts A and B.

Objections will only be accepted from those who have previously submitted specific written comments regarding the proposed project during scoping or other designated opportunity for public comment in accordance with §218.5(a). Issues raised in objections must be based on previously submitted timely, specific written comments regarding the proposed project unless based on new information arising after the designated comment opportunities.

Objections, including attachments, must be filed via mail, express delivery, or messenger service: (to Objection Reviewing Officer, USDA Forest Service, Northern Region, P.O. Box 7669, Missoula, MT 59807); FAX to (406) 329-3411; email to appeals-northern-regional-office@fs.fed.us; or by hand-delivery (Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding holidays at USDA Forest Service, 200 East Broadway, Missoula, MT 59807). Objections will be accepted electronically and should be submitted in Word or PDF format.

Objections must be submitted within 45 calendar days following the publication of this notice in the Lewiston Morning Tribune. The publication date in the newspaper of record is the exclusive means for calculating the time to file an objection. Those wishing to object should not rely upon dates or timeframe information provided by any other source. The regulations prohibit extending the time to file an objection.

The objection must contain the minimum content requirements specified in §218.8(d) and incorporation of documents by reference is permitted only as provided in §218.8(b). It is the objector's responsibility to ensure timely filing of a written objection with the reviewing officer pursuant to §218.9. All objections are available for public inspection during and after the objection process.

At a minimum an objection must include the following (36 CFR 218.8(d)): 1) The objector's name and address, with a telephone number, if available; 2) a signature or other verification of

authorship upon request (a scanned signature for Email may be filed with the objection); 3) when multiple names are listed on an objection, identification of the lead objector (verification of the identity of the lead objector shall be provided upon request); 4) the name of the proposed project, the name and title of the Responsible Official, and the name(s) of the National Forest(s) and/or Ranger District(s) on which the proposed project will be implemented; and 5) a description of those aspects of the proposed project addressed by the objection, including specific issues related to the proposed project if applicable, how the objector believes the environmental analysis or draft decision specifically violates law, regulation, or policy; suggested remedies that would resolve the objection; supporting reasons for the reviewing officer to consider; and 6) a statement that demonstrates connection between prior specific written comments on the particular proposed project or activity and the content of the objection.

Contact Person

For further information concerning this decision, contact Taylor Greenup, Nez Perce-Clearwater National Forest, 12730 Highway 12, Orofino, ID 83544. (phone 208- 476-8228) or Email: tgreenup@fs.fed.us.

Cheryl Probert
Forest Supervisor
Nez Perce-Clearwater National Forests _____ Date

APPENDIX A
Response to Comments

On April 12, 2012, a scoping letter was sent to the interested public on the District NEPA mailing list. There were six replies. The letters were reviewed by the Interdisciplinary Team. The comments and responses are summarized below. Those who commented on the scoping letter:

Brad Chinn, Spokane, Washington
Brad Smith, Conservation Associate, Idaho Conservation League
Alex Irby and Dale Harris, Clearwater Basin Collaborative, Idaho
Lynn Card, Orofino, Idaho
Tom Blunn, Missoula, MT
Daniel Stewart, Watershed Monitoring Coordinator, Dept. of Environmental Quality

Brad Chinn, Spokane, Washington
Mr. Chin believed that the original miners should be held responsible for the cost of the restoration project and inquired as to the history of mining and compliance with regulations at the site. He also wondered if there would be any logging involved with this project.

Thank you for your comments. We have reviewed all available records for mining at the Collette Mine site. The records available on past ownership of the mine claims within the proposed project area indicate that the State of Idaho sought restitution for noncompliance with approved operating plans and loss of bonding during the 1980s. Restoration activities were requested by the Forest Service and occurred prior to abandonment of those claims in 1996, but are not in line with modern reclamation standards and current understanding of stream and floodplain restoration principles. It is also likely given the mining history in the area that some of the conditions at the site were created prior to recorded mining activity. The former claimants no longer have legal responsibility for restoration at the site and cannot be held accountable. The current claimants are not required to assume liability for the abandoned claimants' activities and cannot be held accountable for the cost of restoration to modern day standards.

There is no logging is associated with this project.

Brad Smith, Conservation Associate, Idaho Conservation League
Mr. Smith expressed support for the project and the partnership between the Nez Perce Tribe and US Forest Service. He believes that after restoration efforts have been completed, dredge mining should be discouraged in the project area in order to give the ecosystem an opportunity to fully recover.

Thank you for your support. Any future mining in the project area would require approval of a plan of operations that would specify that claimants would have to restore any portion of the claim in which they operate back to the state in which they found it. Sufficient bonding would also be put into place to cover the costs of reclamation.

Alex Irby and Dale Harris, Clearwater Basin Collaborative, Idaho
Mr. Irby and Mr. Harris expressed support for the project creating healthy fisheries habitat, restoring floodplain functions, and also the creation of jobs through the restoration work.

Thank you for your support.

Lynn Card, Orofino, Idaho (email)
Mr. Card expressed concerns that disturbing the area may affect the water they drink. He felt the soils in the old tailing areas should be sampled and tested since they may contain contaminants such as mercury or strychnine and could present a danger to downstream water users. He also wondered if the project was necessary because he felt there were already thousands of acres of unused habitat. He was concerned that money from the Nez Perce Tribe comes from the NW Power people who raise his electrical rates to fund these projects. He also wondered if the public have access to this area and if any special access was needed or would change upon completion of the project. Additionally, he wondered about the historic value of the site and if it had been withdrawn from mineral entry and the potential for future mining to impact the project. Finally, he wondered how many local people would be employed by this project.

Thank you for your comment. In response to your concerns over contaminants as well as internal concerns, a site assessment was conducted which included review of all available mining records on file at the Nez Perce – Clearwater National Forest; random mercury sampling of water and co-located sediment sites within the project area; and review of Idaho Department of Environmental Quality mercury guidance. We have included a specialized BMP to prevent mercury contamination of surface water in the event that it is discovered during the restoration work.

The project site has been selected due to its importance for providing critical habitat for endangered fish species, and also for restoring floodplain and proper functioning to Lolo Creek. The project has been developed in cooperation with the Nez Perce Tribe who has acquired Bonneville Power Administration (BPA) funds for its implementation. The funds have been specifically designated for this project and can only be used within the Lolo Creek watershed for habitat improvements for anadromous fish. It is beyond the scope of this project to determine if the project would lead to rate increases.

Access to the area currently is by foot traffic only. The project would not change public access.

There are historical cabins at the mine site which have been assessed by an archaeologist. The project has been determined to be in compliance with Section 106 of the National Historic Preservation Act and consistent with state and federal archaeological statutes.

As discussed above, any future mining in the project area would require approval of a plan of operations that would specify that claimants would have to restore any portion of the claim in which they operate back to the state in which they found it. Sufficient bonding would also be put into place to cover the costs of reclamation.

Finally, the majority of our projects that require excavator work are local businesses. It is estimated that the project would employ several individuals for the excavation/dirt moving

work, and an additional crew of several individuals to fence and plant the area once excavation work is completed.

Tom Blunn, Missoula, MT
Mr. Blunn was concerned about the Forest spending money on such a small project area. He questioned the intent of the project and its consistency with science and the best interest of the fish. He also wondered if the site had been a result of past mining and offered that it could have been part of a ribes eradication effort in the 1950s. He also recommended keeping machinery out of the creek to minimize disturbance and to fence out or remove the cows.

Thank you for your comment. As discussed above, the project has been developed in cooperation with the Nez Perce Tribe who has acquired Bonneville Power Administration (BPA) funds for its implementation. The funds have been specifically designated for this project and can only be used within the Lolo Creek watershed for habitat improvements for anadromous fish. A rigorous and peer reviewed scientific analysis was conducted to determine the best methods for restoring this site. We are confident that dredge mining is responsible for the degraded current conditions. Finally, we have included mitigation and design measures to address concerns over machinery operating in Lolo Creek and ungulate browse.

Daniel Stewart, Watershed Monitoring Coordinator, Department of Environmental Quality
Mr. Stewart notified that Lolo Creek is fully supporting all of its beneficial uses and that the project would be considered a nonpoint source activity subject to regulation including implementation of approved or specialized best management practices (BMPs) to protect the beneficial uses of waters of the State.

Thank you for your comment. Project design measures are aimed at avoiding specific resource issues. A majority of these are derived from site specific BMPs from the Idaho Forest Practices Act and Stream Channel Alteration Handbook. BMPs will be applied to maintain slope stability, minimize soil disturbance, erosion and sediment delivery. In addition, the contractor must provide a mitigation plan subject to agency approval to minimize sedimentation. A turbidity monitoring plan will be developed prior to implementation.